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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
PG&E CORPORATION
&
PACIFIC GAS & ELECTRIC COMPANY,
Debtors

Bankruptcy Case No. 19-30088
Chapter 11

**DECLARATION OF
TODD HEARN
SUBMITTED WITH
SUPPLEMENTAL BRIEF
IN SUPPORT OF
MOTION FOR RELIEF
FROM AUTOMATIC STAY**

Dept: Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

TODD HEARN
Creditor and Moving Party
v.
PACIFIC GAS & ELECTRIC COMPANY
Debtor & Responding Party

DECLARATION OF TODD HEARN

2 I, Todd Hearn, do hereby declare and state as follows:

3 1. I am an adult above the age of eighteen years of age. I have personal knowledge of the
4 facts contained herein and if called as a witness I could and would testify competently thereto.

5 2. I worked as a lineman for PG&E for over 20 years.

6 3. On January 22, 2019 PG&E terminated my employment.

7 4. In August of 2019 I received the attached letter ("Exhibit A") informing me that I am
8 ineligible for rehire with PG&E, and ineligible to work on PG&E projects or for any PG&E
9 contractor or subcontractor working on PG&E projects.

10 5. PG&E's lawyer Stacy Campos stated in the Declaration she provided to the Court that I
11 could just obtain employment with another utility or with a municipality. As a career lineman I am
12 familiar with the utilities and municipalities in the Northern California area. There are not any other
13 utilities within several hours of my home in Napa, and as such I can't work as a lineman for a utility
14 unless I commuted to Bakersfield, Nevada, or up north past Mt. Shasta.

15 6. There are municipalities in Sacramento, Santa Clara, and Ukiah, but these are also far
16 from (at least an hour away from) my home in Napa. Because of my family responsibilities (I have
17 two minor children who live at home with me) it would be extremely difficult for me to commute
18 several hours each day. Despite this I have applied for work with these municipalities, but have not
19 received any job offer.

20 7. When PG&E fired me in January, I stopped receiving income and lost my health
21 benefits for me and for my family. I have exhausted all of my savings, and have been forced to
22 withdraw money early from my 401K in order to cover my mortgage payments. I have sold my
23 truck and a family car to try to keep up with my financial obligations, but am severely behind on the
24 payments for my children's school, and am becoming increasingly concerned about how we will
25 make ends meet

1 8. I understand that the legal process of pursuing a whistleblower retaliation Court case
2 may take a long time, but every month counts for me and for my family, and so I therefore request
3 that the Court allow me to move forward and start

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. This declaration was executed on December 30, 2019.

____//s// *Todd Hearn* _____
Todd Hearn

EXHIBIT A

EXHIBIT A



-- Ineligible (no change) for Rehire Letter --

Pacific Gas and Electric Company
Human Resources

08/02/2019

Todd N. Hearn
Personnel Number: #75822
LAN ID: TNH3
[REDACTED] Napa, CA 94559
Phone: [REDACTED]
Email: [REDACTED]

Dear Mr. Todd N. Hearn,

This message is to confirm that your employment status with Pacific Gas and Electric Company (PG&E) has been recently reviewed. At this time, we have decided that your status will remain as "Ineligible" for rehire with PG&E including as a hiring hall employee, or as an agency worker, contractor or subcontractor working on PG&E projects.

If you have any additional questions, please contact us directly via email at
HREmploymentEligibilityReviewCommittee@pge.com.

Sincerely,

Employment Eligibility Review Committee